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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

COMMUNITY ASSOCIATION FOR
RESTORATION OF THE
ENVIRONMENT, INC., a Washington
Non-Profit Corporation

and

CENTER FOR FOOD SAFETY, INC.,
a Washington, D.C. Non-Profit
Corporation,

Plaintiffs,

v.

COW PALACE, LLC, a Washington
Limited Liability Company, THE
DOLSEN COMPANIES, a Washington
Corporation, and THREE D
PROPERTIES, LLC, a Washington
Limited Liability Company,

Defendants.

COMMUNITY ASSOCIATION
FOR RESTORATION OF THE
ENVIRONMENT, INC., a
Washington Non-Profit Corporation

NO. 13-CV-3016-TOR
NO. 13-CV-3017-TOR
NO. 13-CV-3019-TOR

STIPULATION RE: PLAINTIFFS'
MOTION FOR AWARD OF
ATTORNEYS' AND EXPERTS'
FEES AND COSTS

and
CENTER FOR FOOD SAFETY,
INC., a Washington D.C. Non-Profit
Corporation,

Plaintiffs,

v.

GEORGE & MARGARET, LLC, a
Washington Limited Liability
Company,

and
GEORGE DeRUYTER & SON
DAIRY, LLC, a Washington Limited
Liability Company,

and
D&A DAIRY and D&A DAIRY
LLC, a Washington Limited Liability
Company,

Defendants.

COMMUNITY ASSOCIATION FOR
RESTORATION OF THE
ENVIRONMENT, INC., a Washington
Non-Profit Corporation

and
CENTER FOR FOOD SAFETY, INC., a
Washington, D.C. Non-Profit
Corporation,

Plaintiffs,

v.

HENRY BOSMA DAIRY, a
Washington Proprietorship, aka HANK
BOSMA DAIRY, aka BOSMA DAIRY,
LIBERTY DAIRY, LLC, a Washington
Limited Liability Company, ARIZONA
ACRES LIMITED PARTNERSHIP, a
Washington limited partnership,
LIBERTY ACRES, LLC, a Washington

Limited Liability Company, and MR.
HENRY BOSMA, an individual,
Defendants.

Plaintiffs and Defendants in the above-captioned cases hereby stipulate as follows:

1. Pursuant to the fee shifting paragraphs of the Consent Decrees entered in these cases, *see* ECF No. 396 at Para. 52 (Cow Palace docket), ECF No. 246 (Bosma docket), ECF No. 169 (DeRuyter docket), Plaintiffs intend on filing a Motion for an Award of Fees and Costs for the remainder of the fees with the Court in the near future. The Defendants do not contest Plaintiffs' eligibility to fees and costs pursuant to 42 U.S.C. § 6972(e). Although Defendants have yet to see any of Plaintiffs' billings or records, Defendants expect to register a number of objections to Plaintiffs' petition, including but not limited to objections about the hourly rates and hours expended by the various attorneys working on the case, as well as objections about duplication of effort and whether the expenditure of time was reasonable in light of the results in the three cases. In order to simplify the briefing process and to minimize the amount of time spent on the fee petition, the Parties have agreed that Plaintiffs may file one consolidated fee petition, along with supporting documentation, in all three dockets. Defendants shall not make any arguments that some particular time entry or one particular cost is only

attributable to a specific Defendant. Rather, Defendants agree that all reasonable costs and fees awarded in all three actions shall be combined together and then split evenly, one-third each to the Defendants in each case. Defendants reserve their right to make all other arguments about Plaintiffs' fee application.

2. In order to avoid the complexities and time involved in filing separate fee petitions in each case, Defendants stipulate that they will be jointly and severally liable for any award of fees and costs ordered by the Court.

DATED THIS 10th DAY OF JULY, 2015.

By: /s/ Brendan V. Monahan

Brendan V. Monahan (WSBA #22315)
On behalf of Attorneys for Defendants

By: /s/ Charles M. Tebbutt

Charles M. Tebbutt (WSBA #47255)
On behalf of Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2015 I filed a true and correct copy of the foregoing document with the Clerk of Court using the CM/ECF system, which will automatically generate service to the following:

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